

NENA

The 9-1-1 Association

4350 North Fairfax Drive | Suite 750 | Arlington, VA 22203-1695

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

May 14th, 2012

RE: Notice of *ex parte* presentation in PS Docket Nos. 10-255 & 11-153.

Dear Ms. Dortch:

On Monday, May 14th, 2012, I made an *ex parte* presentation on behalf of NENA: The 9-1-1 Association to Patrick Donovan, Attorney Advisor, of the Public Safety and Homeland Security Bureau.

In response to previous questions raised by the Bureau, I shared with Mr. Donovan the results of a nation-wide survey of NENA chapter leadership concerning the level of support within the 9-1-1 community for the imposition of a requirement that wireless carriers support SMS as a transitional text messaging platform for 9-1-1. To arrive at these results, NENA scheduled a series of conference calls with each of our regional representatives and the presidents of each state chapter within those regions, during which we laid out one possible scenario for the imposition of an SMS requirement. Specifically, we asked chapter presidents whether they believed that the majority of PSAPs or 9-1-1 authorities within their state would support, not oppose, or oppose the imposition of a requirement that carriers support SMS-to-9-1-1 if the method of text termination at PSAPs were left to the option of the PSAP. We described a scenario in which a technologically-advanced PSAP could opt for carrier delivery of SMS messages and acceptance of return text via Next Generation 9-1-1 service processes, while a less advanced PSAP could opt to conduct text interactions via TTY translation or some other interim, IP-based method.

The results of NENA's chapter leadership survey were conclusive: A large majority of presidents believe that the majority of PSAP and 9-1-1 authority leaders within their chapter's home states would support the imposition of a mandate under the terms described above, while a minority expressed some specific reservations, but stated that they believed a majority of leaders within their home states would not oppose such a mandate. The primary reservations stated by the minority were two: First, some PSAP administrators are concerned that the imposition of such a mandate could delay the deployment of NG9-1-1 systems in their jurisdictions unless crafted to ensure that PSAPs have flexibility to receive and respond to SMS messages using existing equipment and procedures. Second, some PSAP administrators expressed concern that the unknown effects of SMS handling on the carrying capacity of PSAPs, if large, could have a detrimental impact on quality of service. Without exception, however, members of the minority group agreed that a requirement along the lines described by NENA could prove workable if implemented on a reasonable timeframe, allowing for comprehensive training of PSAP call

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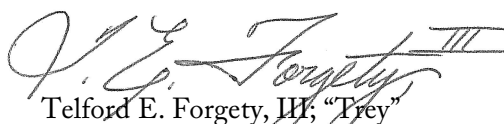
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takers, and with careful efforts to educate the public about the initially limited availability of SMS-to-9-1-1.

In addition to the results of NENA's survey, I called the Bureau's attention to the recent announcement by Verizon that its wireless unit would implement a nation-wide SMS-to-9-1-1 solution in the near future. I also noted that the announced solution appears to coincide with NENA's proposed model for handling the differing capabilities of PSAPs. I expressed NENA's view that this announcement indicates that SMS-to-9-1-1 capabilities can be technically feasible. However, I also expressed NENA's view that, as carriers implement interim web or IP-based text delivery mechanisms, care must be taken to ensure that PSAP interfaces and service processes are not implemented on a fragmentary, carrier-by-carrier basis.

Sincerely,



Telford E. Forgety, III, "Trey"
*Director of Government Affairs
& Regulatory Counsel*

CC: David Furth, Patrick Donovan